

AFFIDAVIT OF VICKI AZNARAN

I, Vicki Aznaran, declare as follows under penalty of perjury under the laws of the State of California:

1. I have read Bent Corydon's Fourth Amended Complaint and am familiar with many of the people, entities and facts alleged therein.

2. From 1983 through early 1987 I was the President of the Religious Technology Center, (RTC). The position of RTC in Scientology was described at the Mission Holders Conference of October 17, 1982 (see transcript attached hereto as Exhibit A) and is graphically represented on a chart prepared by Lymon Spurlock for presentation at that meeting. That chart is attached hereto as Exhibit A - A. According to the chart RTC is at the top of Scientology.

3. Because of my extensive indoctrination and experience as a Scientologist and my years in RTC, I know from personal knowledge that in the mind of Scientology one of the foremost enemies is a Squirrel. Squirrels are defined in Hubbard's Technical Dictionary as a person "altering Scn [Scientology] or who "engages in offbeat practices".

This is particularly odious to Scientology because if counsellors who have broken from "standard practice" (ie. under the control of Scientology's leaders) provide services to customers ("parishioners") who have left the oppressive environment of the Church, the profitability of Scientology is threatened. Thus, squirrels are despised and persecuted in Scientology.

4. I first met David Miscavige in 1978 when I was Deputy Special Unit Representative under Pat Broeker. Based on my personal knowledge at the time I became president of RTC I believe he was one of the most powerful individuals in Scientology which included, in addition to L. Ron Hubbard and Miscavige, Pat and Anne Broeker, Norman Starkey and Lymon Spurlock. After Hubbard's death in 1986 Miscavige successfully ousted the Broekers from power and consolidated his position as the most powerful individual in Scientology.

5. David Miscavige was the Chairman of the Board of Author Services Inc., ("ASI") in 1984 and 1985. ASI was incorporated to be the funnel through which profits from Scientology were channelled to Hubbard and, therefore, it was very important within Scientology. Miscavige represented Hubbard in all aspects of controlling Scientology. He attended regular meetings with myself and other top officials of Scientology organizations to review the status of all Scientology's activities including its litigation and dirty tricks campaigns against Scientology's enemies.

6. At one meeting in 1984 or 1985 Miscavige told those present that all of Scientology should be more aggressive in their fair game attacks upon and injuries inflicted on Scientology's enemies, especially squirrels. At that time Bent Corydon was a hated squirrel who vexed Scientology's leadership by his refusal to give up his outspoken position. He had been in litigation with Scientology for several years and refused to fold.

7. Although I never heard Miscavige order an attack against Corydon by name I knew and believe that everyone at that meeting knew that Corydon was included in Miscavige's directive because he was one of the best known and most troublesome defectors from Scientology.

8. Similarly, there could be no doubt that Miscavige meant that all types of attack be used, including physical attacks, defamation, and efforts to cause Corydon to go into bankruptcy. Miscavige had been known to personally use violence against recalcitrant followers: slapping, striking, and spitting them in the face. Also, economic pressure, preferably to force people to bankruptcy, was always high on the list of acceptable Scientology attacks against enemies. None of this had to be expressly be stated to be understood because Scientology "scripture" directs that enemies be subjected to fair game by all Scientologists, that is, Scientology "scripture" contains a "fair game" policy that dictates that enemies may be

"Deprived of property or injured by any means by any Scientologist, without discipline of the Scientologist. May be tricked, sued lied to or destroyed."

HCO Policy Letter October 18, 1967

A true copy of HCO Policy Letter October 18, 1967 is attached hereto as Exhibit A - B.

9. Because of my position and the regular reports that came across my desk I know that throughout my presidency of RTC

that fair game actions against enemies were commonplace. In addition to the litigation tactics described below, fair game activities included burglaries, assaults, disruption of enemies' businesses, spying, harassive investigations, abuse of confidential communications in parishioner files and so on. I specifically recall seeing one report regarding attacks against Bent Corydon after Scientology became aware that he was writing a book against Hubbard.

10. Other Hubbard writings encourage Scientologists to pursue litigation purely for harassment without regard to the merits of a claim to cause enemies to fold. Hubbard's writings state:

"The purpose of the suit is to harass and discourage rather than to win... The law can be used very easily to harrass, and ... will generally be sufficient to cause [the enemy's] professional decease. If possible, of course ruin him utterly." Hubbard, "Magazine Articles on Level 0 Checksheet" American Saint Hill Organization 1968. A true copy of the excerpt from "Magazine Articles on Level 0 Checksheet" is attached hereto as Exhibit A - C. See page 55.

Pursuant to this statement it has become the practice of Scientology's management to use litigation for harassment and to cause the financial ruin of adversaries as part of the fair game policy. This is made even worse by the fact that Scientology has, in name only, many "independent corporations".

The false representations that the numerous Scientology corporations are independent entities permits Scientology to harass its enemies by filing multiple lawsuits all directed by

the same people and all raising the same issues against the same defendants, while their lawyers fraudulently claim that the entities they are representing are independent. At the same time Scientology makes it a practice to refuse to produce almost all discovery, with the objective of increasing the litigation costs and causing delay. Furthermore Scientology often resorts to the destruction of evidence. I know this on personal knowledge because I participated in the destruction of files of ex-Scientologists who were in litigation with the Church.

11. Ultimate control of all Scientology corporations rested with Miscavige, Norman Starkey and Lymon Spurlock and, until they were deposed, Pat and Annie Broeker (except that, prior to his death, Hubbard could himself intervene regarding any order). This control was not limited to so-called "ecclesiastical" matters but extended to all operations, all finances and all planning of all Scientology entities and totally ignored theoretical corporate independence. This control was enforced in several ways. For example there was the ever present threat that if you disobeyed "Command Intention" (orders from above) you would be declared the target of the fair game policy. In addition, if any person within Scientology believes that any other person is "off-policy" or acting in some way contrary to Scientology's purposes, they are encouraged to send to higher-ups a statement called a "Knowledge Report" to expose that person.

12. Although Author Services Inc. (ASI) has never to my knowledge appeared on any command chart distributed to Scientologists, ASI is an integral part of Scientology and was

for some time the controlling entity over all of Scientology along with RTC. Some of the facts on which I base this statement are stated in the next few paragraphs.

13. ASI was incorporated at about the same time as the massive restructuring of all Scientology organizations by high ranking Scientologists. The incorporators and original officers were all Scientologists, and ASI was specifically created to be the entity through which Hubbard could, and did, exercise control over Scientology money and receive huge payments.

14. At the October 1982 Mission Holders' Conference in San Francisco, the mission holders were ordered to increase their weekly payments (called "tithes") from 10% to 15% of their gross income. The additional 5% was to be used for a massive public relations campaign to increase the publicity for Hubbard's science fiction books. This was part of an overall plan to dramatically increase the visibility of Hubbard's name so that the market would be more receptive to a new public relations blitz promoting DIANETICS, the first stage in the selling of enormously expensive Scientology counselling and courses. The 5% payment increase was ordered by and its use controlled by ASI with the aid of Bridge Publications Inc. ("BPI").

15. The Scientology Managing Agents (Hubbard, Miscavige, Starkey, Spurlock and their handmaiden organizations: the Commodore's Messenger Organization, the Sea Organization, ASI, RTC, CSC and SMI) had de facto controlling power over all Scientology entities through the exercise of the coercive threat of the fair game policy. It was this threat that kept most Scientologists in line. This power could be maliciously exercised

as, for example, at the Mission Holder's Conference of 1982 when a mission holder named Gary Smith was summarily declared a suppressive person (thus subjecting him to fair game) because he refused to move from a rear seat in the conference room to a front seat.

16. ASI claims to represent not only Hubbard but other writers but its only real motive and activity is the promotion of Hubbard's writing, the expansion of Scientology and personal aggrandizement and power of the personalities who control Scientology. The only other writers it represented at all prior to my departure from Scientology in 1987 are those included in the annual volume of new writers of science fiction called Writers of the Future. This was its only non-exclusively Hubbard project and this project was mandated to be implemented by Hubbard to promote him as a patron of the arts.

17. As part of their attempt to expand and complete their control of Scientology and to gain control of valuable assets belonging to the missions, the managing agents ordered the independently incorporated missions to adopt new Articles and By-laws prepared by them under which the missions would have to submit to control by the managing agents acting principally through the Sea Org, RTC, CSI, and SMI, and the Commodore's Messenger Organization. While most missions succumbed to this power play, some, such as the Church of Scientology Mission of Riverside (COSMOR), under the leadership of Bent Corydon, did not.

18. The effort to "regularize" control over the

missions and all of Scientology by the managing agents is documented by the transcript of the Mission Holder's meeting of October 17, 1982. That meeting was audio-taped and a transcript, including three charts showing the control changes, were sent out to all mission holders after the meeting. A complete copy of the transcript is attached hereto as Exhibit D.

The transcript shows that RTC had authority (shown on the authority lines on Chart No. 3) to issue orders to CSI and SMI and the missions, that CSI also had direct power over both SMI and the missions, and, that SMI also had direct power over the missions.

Sworn to under penalty of perjury this 26th day of

Sept. 1989.

Vicki Aznaran
VICKI AZNARAN

Dallas County)
)
State of Texas)

On this 26th day of Sept 1989, personally appeared Vicki Aznaran, known to me or proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the instrument above and executed the same.

For witness whereof I have hereunto set my hand and affixed my official seal the day and year first written above.

Notary Public in and for
the State of Texas. My
Commission expires on
_____.